

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Conditional Major / Construction / Operating
Permit: F-07-052

Flowers Baking Co. of Kentucky LLC.
1755 Parkway Drive, Bardstown, KY 40004
January 31, 2008

Massoud Kayvanjah, Reviewer

SOURCE ID:	21-179-00061
AGENCY INTEREST:	97789
ACTIVITY:	APE20070001

SOURCE DESCRIPTION:

Flowers Baking Company of Kentucky, LLC, submitted an application to the Division on September 12, 2007 to construct and operate a bread manufacturing facility at 1755 Parkway Drive, Bardstown, Kentucky. The facility will process 11,200 pounds per hour dough to produce packages of bread, using a 7 MMBtu/hr natural gas burning bun-oven and two natural gas fuel boilers rated each at 6.28 MMBtu/hr for steam. Baking dough has the potential to emit VOC above the major source threshold of 100 tons/year. The facility has requested a federally enforceable permit. A ninety five (95) percent efficient thermal oxidizer will be installed on the oven for destruction of the VOC and HAPs. Controlled emissions of the baking oven shall reduce VOC emissions below the major source threshold. This permit is being issued as federally enforceable state origin permit for non-major source (Conditional Major).

PUBLIC AND AFFECTED STATE REVIEW:

Public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published on November 18, 2007, in *The Bardstown KY Standard* in Bardstown, Kentucky. The public comment period expired 30 days from the date of publication. No states are affected by this permit action.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.